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8 *Additional Counsel on Signature Page*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **OAKLAND DIVISION**

13 In re Lyft, Inc. Securities Litigation,

14 Lead Case No.: 4:19-cv-02690-HSG

This document relates to:

**Joint Stipulation and Order Granting**  
**Lead Plaintiff's Motion to Remove**  
**Incorrectly Filed Documents**

15 ALL ACTIONS

16 Judge: The Hon. Haywood S. Gilliam, Jr.

1 Pursuant to Civil L.R. 7-11(a) and 7-12, Lead Plaintiff Rick Keiner (“Lead Plaintiff”) and  
 2 Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts, Prashant (Sean) Aggarwal, Ben  
 3 Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes  
 4 Wilderotter (“Defendants”) (together the “Parties”), through their counsel, submit the following  
 5 Joint Stipulation and [Proposed] Order regarding Lead Plaintiff’s Motion to Remove Incorrectly  
 6 Filed Documents.

7 WHEREAS, on May 24, 2021, at 2:30pm Lead Plaintiff filed his Administrative Motion  
 8 to Seal at ECF 158 (“Motion to Seal”);

9 WHEREAS, two attachments to Lead Plaintiff’s Motion to Seal, (1) Lead Plaintiff’s  
 10 Opposition to Defendants’ Motion for Judgment on the Pleadings [REDACTED VERSION OF  
 11 DOCUMENT(S) SOUGHT TO BE SEALED] (ECF 158-3); and (2) the Declaration of Jeffrey C.  
 12 Block in Support of Lead Plaintiff’s Opposition to Defendants’ Motion for Judgment on the  
 13 Pleadings [REDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED] (ECF 158-  
 14 5) (together the “Two Attachments”) were inadvertently filed with unredacted confidential  
 15 information;

16 WHEREAS, Lead Counsel promptly contacted via telephone the ECF HelpDesk (866-638-  
 17 7829) which placed a lock on the Two Attachments by no later than 3:00pm;

18 WHEREAS, on May 28, 2021, Defendants filed a declaration pursuant to Civil L.R. 79-  
 19 5(e)(1) arguing that the material they have designated as “confidential” is sealable under Civil L.R.  
 20 79-5(b) and do not believe the designated information contained in the Two Attachments should  
 21 be publicly available (ECF 164);

22 WHEREAS, on May 28, 2021, the Magistrate Judge granted an earlier motion to seal the  
 23 same information that was designated “confidential” in the Two Attachments (ECF 161);

24 WHEREAS, on June 16, 2021 Lead Plaintiff filed a corrected Administrative Motion to  
 25 Seal with corrected copies of the Two Attachments;

26 NOW, THEREFORE, the Parties hereby stipulate, subject to Court approval, that the Two  
 27 Attachments, filed electronically at ECF 158-3 and ECF 158-5, be removed from the docket.

1 Stipulated and agreed to by:  
2

3 Date: June 16, 2021  
4

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15 *Prashant Aggarwal, Ben Horowitz,*  
16 *Valerie Jarrett, David Lawee, Hiroshi*  
17 *Mikitani, Ann Miura-Ko, and Mary Agnes*  
18 *Wilderotter*

## **FILER'S ATTESTATION**

Pursuant to Civil L. R. 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories hereto.

Dated: June 16, 2021

/s/ Whitney E. Street  
Whitney E. Street

\* \* \*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 6/17/2021

  
Haywood S. Gilliam, Jr.  
U.S. District Court Judge